

UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII
Honolulu, Hawaii

RECEIVED
CLERK, U.S. DISTRICT COURT

JUN 15 2006

DISTRICT OF HAWAII

IN RE:
ESTATE OF FERDINAND E. MARCOS
HUMAN RIGHTS LITIGATION

MDL NO. 840
No. 86-390
No. 86-330

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

Hilao et al. v. Estate of Ferdinand
E. Marcos,
and

De Vera et al. v. Estate of Ferdinand
E. Marcos

JUN 15 2006
at 1 o'clock and 05 min.
SUE BEITIA, CLERK

X-----X

**OPPOSITION TO CLASS COUNSEL'S MOTION
FOR INTERIM AWARD OF 30% OF THE FUND**

UNDERSIGNED Class-suit plaintiffs-claimants from Mindanao, Philippines, and unto this Honorable District court of Hawaii, most respectfully state:

1. That the undersigned just recently received of class-suit counsels request to render an interim award of counsels fees totaling 30 % of the fund after deducting first deducting reimbursement of counsel's expenses in the amount of \$1,033,900.09 and further set aside \$775,000 to cover past and future expenses;

2. The undersigned, with all the due respect to their counsels, objects as they hereby interposes an objection or opposition to said request for and interim award of the above-said amount, being premature, expenses made unsubstantiated by data, figures not reconciled with the actual expenses and the accounting of advance expenses not being furnished to the claimants; further it lacks satisfactory explanation and disseminations in the methods and accounting of present and future expenses, especially in the distribution of the claims due the individual claimant ;

3. Further, the 30% per cent sought to be awarded ahead of the actual distribution of whatever due the class suit claimants is so high that if granted in full percentage would cause suspicion that any future act/s for the protection of what has already been won could not be amply protected or defended;

4. Considering all the foregoing, among others safety measures to amply protect the interest of the undersigned, the latter has no objection that an interim award would only be 10 % and not 30 % and that reimbursement should be properly accounted and audited.

WHEREFORE, premises considered, it is most respectfully prayed of this Honorable Court not to allow an interim award of 30% instead 10 % shall be granted pending the final distribution of the award or damages due the class suit claimants/plaintiffs.

Other relief and remedies deemed just and equitable are prayed for

V E R I F I C A T I O N

REPUBLIC OF THE PHILIPPINES)
CITY OF DAVAO, MINDANAO) S.S
X-----X

That We, the above-named class-suit claimants in Mindanao, Philippines under oath, depose and say:

That we are the plaintiffs-claimants in the above-entitled cases;

That we caused the preparation of the foregoing opposition comments/pleadings;

That the allegations therein are true and correct of our own personal knowledge and understanding;

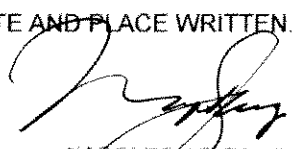
IN WITNESS WHEREOF, we hereunto affixed our hand this day of JUN 13 2006 at Davao City, Philippines.

Class-suit CLAIMANTS-PLAINTIFFS /AFFIANTS
With their individual Names, Addresses, Signatures
and Personal Identifications Numbers below in
the next succeeding pages who Subscribed and Sworn
to before a Notary Public for and in the City of Davao,
Mindanao, Philippines.

SUBSCRIBED AND SWORN before me this day of JUN 13 2006 at Davao City, Philippines.

WITNESS MY HAND ON THE ABOVE DATE AND PLACE WRITTEN.

Doc. No. 407
Page No. 82
Book No. XV
Series of 2006.


NAPOLEON SANGO
Notary Public
Until December 31, 2006
PTR No. 3411934 D.C. 1-04-06
IBP No. 561670 D.C. 1-04-06
TIN 105-141-159
Roll No. 32978
Serial # 142-2005

Position Paper re ESTATE OF FERDINAND E. MARCOS HUMAN RIGHTS LITIGATION

We, the Claimants comprised of 9, 539 Philippine citizens (or their heirs) who have been tortured, summarily executed or disappeared during the Marcos rule, do not agree on the 30% of class counsel's application for attorney's fees and expenses. Such, amount is too big. Instead, we are recommending 10% for attorney's fees and expenses.

We PRAYED that the Courtroom of the Honorable Manuel L. Real, United States Courthouse, Honolulu, Hawaii will grant and take our recommendation positively.

We affixed our Signature on 13th of June 2006.

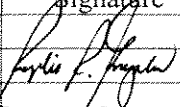
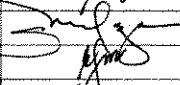
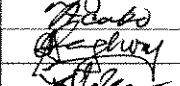
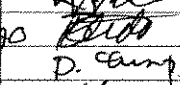

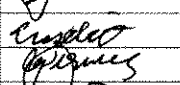
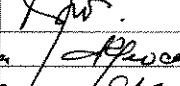
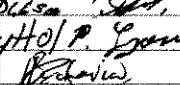
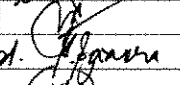
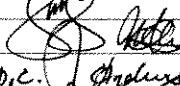
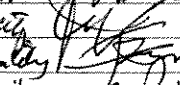

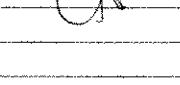
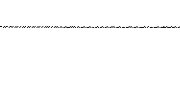




Name	Address	Signature
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Rocelyn Andaneza	Matamo - Davao - Sur	[Signature]
Enrique A. Arana	Malanan Davao Sur	[Signature]
PETER BADIANG	BELESARIO VILL AGDAO D.C.	[Signature]
DUMAPTE, DUMAPTE, KEIRAN	PARISONA ST, MALANAN D.C.	[Signature]
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Alfredo Cadaragan	Durok 10-A San Miguel town City	[Signature]
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Araceli Pedrosa	San Miguel Mat. Davao Sur	[Signature]
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Domingo M. Andanan	Cabasagan, " - D/S	[Signature]
Jennell B. Parayon	Barokel " "	[Signature]
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HEMESIO CORONEL	New Katipunan Mat D/S	[Signature]
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Romulo Debaton	Cabasagan Matamor D/S	[Signature]
Antonio Ortiz	San Miguel/Indangan D.C.	[Signature]
Amacio Puy	Manga Matamor Davao Sur	[Signature]
Flavio Ceruel	Cabasagan Mat D/S	[Signature]
Florinda Ceruel	Cabasagan Mat D/S	[Signature]
HERBERTO GEARLE	San Miguel Mat. D/S	[Signature]
Ernesto Carreon	San Cruz	[Signature]
HILARION DAYAG	Calinan Lampiran D.C.	[Signature]
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Nicenor R. Gonzales Jr.	#9 Juan Lim Street Davao City	[Signature]
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